IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE NORTHERN DIVISION

TRINITY GODFREY and)
KEVIN GODFREY,)
)
Plaintiffs,)
)
VS.) No. 3:22-cv-00384
) JURY DEMAND (12-PERSON)
WAL-MART STORES EAST, L.P.,)
)
Defendant.)

NOTICE OF REMOVAL

Defendant hereby gives notice of the removal pursuant to 28 U.S.C. § 1441 et. seq., of the following action filed against it: <u>Trinity Godfrey and Kevin Godfrey v. Wal-Mart Stores East, L.P.</u>; in the Circuit Court for Knox County, Tennessee, No. 2-119-22.

A copy of the summons is attached as Exhibit A. A copy of the complaint is attached as Exhibit B. Plaintiffs are citizens and residents of Knox County, Tennessee.

Defendant may be referred to as "Wal-Mart" in this document.

Wal-Mart Stores East, LP is a Delaware limited partnership. The general partner is WSE Management, LLC, a Delaware limited liability company. The limited partner is WSE Investment, LLC, a Delaware limited liability company. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores East, LLC fka Wal-Mart Stores East, Inc., an Arkansas limited liability company. The sole member of Wal-Mart Stores East, LLC is Walmart Inc. fka Wal-Mart Stores, Inc., a Delaware corporation. There are no other owners of Wal-Mart Stores East, LLC. Walmart Inc. is and was at the times plaintiff's complaint was filed and this matter being removed to this Court a corporation organized and existing under the laws of the State of Delaware with its principal place of business in Bentonville, Arkansas. Walmart Inc. is a publicly traded company on the New York Stock Exchange and traded under the symbol WMT. No publicly traded entity owns

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more than 10% of Walmart Inc. The principal place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states.

The amount in controversy is in excess of the federal jurisdictional requisite of \$75,000. The complaint demands judgment against defendant "in the amount of two-hundred-and-fifty-thousand-dollars (\$250,000.00)."

Defendant was served with process on October 3, 2022. Fewer than thirty days have expired since service of process on Defendant. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b).

WHEREFORE, Defendant hereby gives notice of the removal of this action pending in the Circuit Court of Knox County, Tennessee, to the United States District Court for the Eastern District of Tennessee, Northern Division, and requests that the proceedings be held thereon.

/s/ Maria T. de Quesada

G. Andrew Rowlett, No. 16277
Maria T. de Quesada, No. 24389
HOWELL & FISHER, PLLC
3310 West End Avenue, Suite 550
Nashville, TN 37203
arowlett@howell-fisher.com
mdequesada@howell-fisher.com
#615/244-3370
Attorney for defendant

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was electronically filed with the Court and was served by U.S. Mail, postage prepaid, upon:

David R. Grimmett, Esq.
GRIMMETT LAW FIRM, PLLC
3326 Aspen Grove Drive
Suite 310, Lincoln Square
Franklin, TN 37067
dgrimmett@grimmettlawfirm.com

this the 31st day of October, 2022.

/s/ Maria T. de Quesada